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**FILED ELECTRONICALLY VIA ECFS**

**August 19, 2002**

**Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TWB-204  
Washington, DC 20554**

**Re: Ex Parte — Qwest Communications International, Inc.  
Consolidated Application for Authority to Provide In-Region, Inter-  
LATA Services in Montana, Utah, Washington, and Wyoming, WC  
Docket No. 02-189**

**Dear Ms. Dortch:**

**On August 15, 2002, the undersigned and Don Petry, representing Hewlett-Packard ("HP"), met by telephone conference with Jon Minkoff of the FCC's Wireline Competition Bureau to respond to a follow-up clarifying question regarding Qwest's 7/29/02 ex parte letter in WC Docket 02-148 concerning LSR rejection rates.**

**The clarification was in regards to HP's LSR rejection rates cited in the Qwest ex parte document and KPMG's Test 12 results reported in Test cross-reference 12-5-6. The following is a summary of HP's answer:**

The results published by KPMG in Test cross-reference 12-5-6 are an aggregate of:

- All Master Test Plan Test 12 Feature Function related orders submitted between April 2001 and March 2002
- All 16 different order products documented on pages 12-A-12 and 12-A-13 in the HP Final Discrete Report 12-A Test Results: POP Functional Evaluation (Test 12)
- All LSR rejects that resulted in the issuance of an Exception or Observation (i.e., HP Exception 2007 and Exception 2086)
- All LSR rejects that may have been a result of a Qwest OSS interface issue (e.g., Qwest System Event Notifications)

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- All LSR rejects that may have been a result of test bed provisioning (see page 10, Section 5.4 Test Bed of the KPMG Final Report for a definition of the test bed)

In comparison, Table 1 and Chart 1 represent only the P-CLEC UNE-P PID re-test LSR activity via IMA EDI for the last four months of the ROC 271 test.

LSR reject rates can vary by CLEC for numerous reasons listed below:

- Use of documented ordering processes and training
- Experience of customer service representative or turnover of service center staff
- Use of ILEC or CLEC data entry applications and the degree of integration of these applications
- Adherence to business processes and rules
- Validation of account and order information

**This letter is hereby submitted for inclusion in the record for the above-captioned proceeding.**

**Respectfully submitted,**

**Geoff May  
Hewlett-Packard**